

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

CHING PING CHEUNG,

Plaintiff,

v.

6213.COM, an Internet domain name, and
JOHN DOE,

Defendants.

Civil Action No. 17-cv-00258-CMH-IDD

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

Plaintiff Ching Ping Cheung ("Plaintiff" or "Mr. Cheung"), by counsel, hereby moves, pursuant to Fed. R. Civ. P. 55(b) and the Local Rules of this Court, for the entry of a default judgment against Defendant Internet domain name 6213.com in accordance with the accompanying memorandum of points and authorities.

As set forth in more detail in the accompanying memorandum of points and authorities, the Defendant domain name is a .COM domain name maintained in this judicial district by the top-level domain name registry for .COM domain names, VeriSign, Inc. Plaintiff moves for an Order: (i) entering Judgment against Defendant 6213.com on Count I of Plaintiff's Verified Complaint; (ii) dismissing Counts II, III, IV, and V of Plaintiff's Verified Complaint without prejudice; (iii) directing VeriSign, Inc. to transfer the Defendant domain name to Plaintiff's domain name registrar of choice, GoDaddy.com, LLC, and directing GoDaddy.com, LLC to take all necessary steps to have Mr. Cheung listed as the registrant for the 6213.com domain name; and (iv) providing such further relief as the Court determines just and proper.

Dated: May 11, 2017

By: /s/ Attison L. Barnes, III /s/
Attison L. Barnes, III (VA Bar No. 30458)
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Counsel for Plaintiff Ching Ping Cheung

CERTIFICATE OF SERVICE

I, Attison L. Barnes, III, hereby certify that on May 11, 2017, I electronically filed the foregoing by using the CM/ECF system. I also sent a copy to the registrant of the domain name at the postal and email address provided by the registrant to the registrar of the 6213.com domain name:

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/s/ Attison L. Barnes, III /s/

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